

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FOX VALLEY LABORERS HEALTH AND	)	
WELFARE FUND, <i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 21 C 6809
v.	)	
	)	JUDGE SARA L. ELLIS
PORTER BROTHERS CONSTRUCTION, INC.,	)	
an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, PORTER BROTHERS CONSTRUCTION, INC., an Illinois corporation, in the total amount of \$51,353.94, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,190.00.

On December 27, 2021, the Summons and Complaint was served on the Registered Agent, Trent L. Bush (by tendering a copy of said documents to him personally) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on January 17, 2022. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Catherine M. Chapman

Catherine M. Chapman  
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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 11th day of February 2022:

Mr. Trent L. Bush, Registered Agent  
Porter Brothers Construction, Inc.  
202 East 5th Street  
Sterling, IL 61081-3651

Mr. Matthew Porter, President  
Porter Brothers Construction, Inc.  
1106 Industrial Park Road  
Rock Falls, IL 61071-3162

Mr. Matthew Porter, President  
Porter Brothers Construction, Inc.  
9904 Freeport Road  
Rock Falls, IL 61071-9502

/s/ Catherine M. Chapman

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